

# EXHIBIT 15

RESPONSE TO OMNIBUS OBJECTION

CLAIM #176132

I. CONTACT INFORMATION

A. Name: Juana M. Delgado Pérez

B. Mailing Address: #550 Camino de los Jazmines

Urb Veredas Gurabo P.R. 00778

C. Contact Home Phone: \_\_\_\_\_ Cell 787-473-0401

II. CAPTION

A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection regarding request for amounts not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

#94057 – June 8, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Roselló – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 *Romerazo* – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Roselló – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón – effective January 2004

## Letter of Justification

### Claim # 176132

Dear Sirs:

This letter is to justify the reason why I was unable to send the response to the Omnibus Objection on time. The reasons this was not possible were due to the fact that I underwent surgery, which left me bedridden and unable to move for several months, being cared for by my husband, who was my only help and couldn't leave me alone at any time. I was bedridden for several months and later was unable to walk or leave the house. I didn't have anyone who could file this claim and send it by mail on time. It is for this reason that I am proceeding to do so now.

My claim is based on unreceived pay raises under laws that were enacted during my years of service with the Communications Corporation, which began on August 1, 1995, and continued with the merger of the Puerto Rico Telephone Company in May 1994. At that time and until 1999, when that company was sold by the government in power, and so I was part of the government of Puerto Rico until that time.

Act 89, *Romerazo*, July 1995, I do not agree with my claim being dismissed, due to the fact that the Communications Corporation, where I began on August 16, 1985, and the Puerto Rico Telephone Company, where the merger of both agencies took place in May 1994, later in 1999 it was sold by the governor Pedro Roselló, it was at that time that the PRTC became a private agency. As such, my claims are fair, as there is money unpaid from pay raises that I am entitled to and are owed to me.

I ask that my request be considered and accepted, and that it be considered in the lawsuit, as my justification is reasonable, given the surgery and disability I suffered for many months, from which I have still not fully recovered. For all the foregoing reasons, I was unable to send my response, as I was unable to care for myself.

Sincerely,

Juana M. Delgado Pérez

Printed name

[signature]

Signature

#### IV. SUPPORTING DOCUMENTATION

Enclosed are documents demonstrating years of service with the Puerto Rico Telephone Company, Guaynabo, Puerto Rico, from August 16, 1985 to May 1, 2006. I finished my career as an Administrative Assistant II (2) at the Puerto Rico Telephone Company, Guaynabo, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of service.

Enclosed are documents as evidence for this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Juana M. Delgado Pérez

Printed name

[signature]

Signature



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

### **CERTIFICATION**

**JUANA M. DELGADO PEREZ  
XXX-XX-9321**

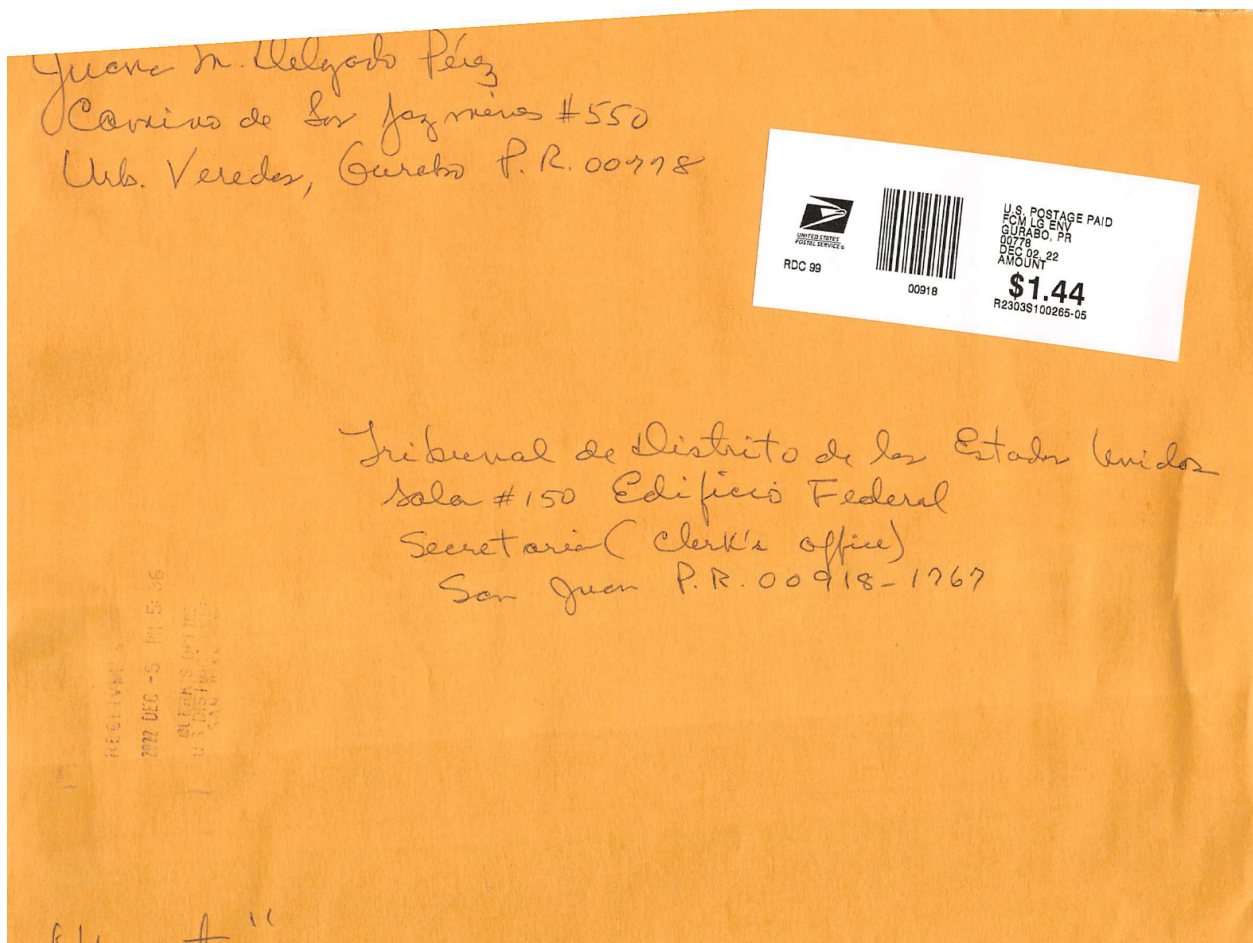
For the abovenamed former employee, we certify the following:

- She joined PRT/Claro effective 08/16/1985.
- She worked as a regular employee until 05/01/2006.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Thursday, September 3, 2020.

**Abigail Alejandro González**

Abigail Alejandro González  
Compensation Officer  
Compensation and Records





**T** 718.384.8040  
**W** TargemTranslations.com  
**E** projects@targemtranslations.com  
**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **ECF 22994**

Signed this 18<sup>th</sup> of January 2023



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea Boscor', written over a horizontal line.

Andreea I. Boscor

